

EQUATIONS ANALYSIS OF (DRAFT) GUIDELINES FOR ECOTOURISM IN AND AROUND PROTECTED AREAS

ISSUED BY MoEF

JUNE 2, 2011

Foreword

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
Para 2: Ecotourism is tourism that is compatible with these fragile landscapes, providing enhanced livelihoods to local communities				Need to subscribe to a definition of ecotourism which is wider and contains various aspects of ecotourism	We have suggested below a broader definition for ecotourism.
Para 2: On livelihoods: Without their full participation and without their realising the benefits of ecotourism in tangible visible measure, our protected areas cannot remain protected in any meaningful manner		This is a patronising view of communities who have for centuries taken care of our forests. Further the link between ecotourism - livelihoods - conservation is completely unfounded since these have not been proved in our country			
Para 3: These guidelines are necessarily broad: these are guidelines and not dictats		In the absence of updated ecotourism policies (central and state), these guidelines need to be enforceable as a common minimum with states making additional guidelines		Make these enforceable	These guidelines are necessarily broad but enforceable as the basic requirement for any ecotourism strategy/plan that is developed.

Preamble

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<p>Ecotourism has the potential to enhance wilderness protection and wildlife conservation, while providing nature-compatible livelihoods and greater incomes for a large number of people living around natural ecosystems</p> <p>This document lays out a detailed set of framework guidelines on the selection, planning, development, implementation and monitoring of ecotourism in India. Recognising however, that India's wildlife landscapes are diverse, these guidelines are necessarily broad, with specific State Ecotourism Strategies to be developed by the concerned State Governments, and Ecotourism Plans to be developed by the concerned Authorities. Roles and responsibilities are enumerated for different stakeholders: State Governments, Protected Area</p>		<p>The relationship between ecotourism and conservation, ecotourism and livelihoods has not been established in any substantive way to make the claim that it is a development strategy. As far as conservation is concerned, ecotourism has the possibility for generating funds for conservation. Currently, ecotourism can generate funds for the state which could be used for conservation.</p>		<p>If we want to promote ecotourism, we should do it for its own sake and not use conservation as the excuse. If we are to re-articulate our motivations for ecotourism, only then would we be able to put in place the required checks and balances.</p>	<p>Ecotourism has the potential to enhance wilderness protection and wildlife conservation, while providing livelihood which can supplement existing nature-compatible livelihoods like agriculture, livestock grazing, NTFP etc. for people living in and around natural ecosystems. If conducted in a regulated manner, it can help contribute to protection of wildlife or forest areas.</p> <p>This document lays out a detailed set of framework guidelines on the selection, planning, development, implementation and monitoring of ecotourism in India. Recognising however, that India's wildlife landscapes are diverse, these guidelines are necessarily broad, with specific State Ecotourism Strategies to be developed by the concerned State Governments, and Ecotourism Plans to be developed by the concerned Authorities mandatorily taking into account these guidelines. Central to the guidelines are the following core values: people-centered, accountable, democratic/participatory/equitable and non-exploitative, which mandatorily will have to be reflected in the state ecotourism strategies. Roles and responsibilities are</p>

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<p>management, tourist facilities/tour operators, local communities, temple boards and general public.</p>					<p>enumerated for different stakeholders: State Governments, Protected Area management, tourist facilities/tour operators, local communities, temple boards and general public. Types of tourism activities allowable are also enumerated. These guidelines take into account the constitutional provisions as well as the following important legislations and policy:</p> <p>Wildlife Protection Act, 1972 Forest Conservation Act, 1980 Environmental Protection Act, 1986 Panchayati Raj Act - 73rd amendment Panchayats (Extension to the Scheduled Areas) Act, 1996 National Ecotourism Policy, 1998 National Tourism Policy, 2002 Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 Guidelines for declaration of Eco Sensitive Zones around National Parks and Wildlife Sanctuaries, 2011 Directives of the Supreme Court</p>

1. The Need for Ecotourism Guidelines

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<p>1.1 Ecotourism is defined as 'responsible travel to natural areas that conserves the environment and improves the well-being of local people'. Such tourism is low impact, educational, and conserves the environment while directly benefiting the economic development of local communities.</p>		<p>Limited definition. We need to define ecotourism in the context of realities in India, primarily the fact that forests in our country are inhabited unlike those in Africa/US etc</p>		<p>Use the IUCN definition: Environmentally responsible travel and visitation to relatively undisturbed natural areas, in order to enjoy and appreciate nature (and any accompanying cultural features - both past and present) that promote conservation, has low visitor impact, and provides for beneficially active socio-economic involvement of local population.</p>	<p>1.1 Ecotourism is defined as "Environmentally responsible travel and visitation to relatively undisturbed natural areas, in order to enjoy and appreciate nature (and any accompanying cultural features - both past and present) that promote conservation, has low visitor impact, and provides for beneficially active socio-economic involvement of local population". Such tourism is in keeping with the aspirations of local communities' for tourism, has low negative social, cultural and economic impact on the community, is educational for the tourists and conserves the environment</p>
<p>1.2 Most wilderness areas across India are fragile ecosystems that provide a whole host of ecosystem services to local residents and people living downstream; and continue to remain important tourist attractions. However, unplanned tourism in such landscapes can destroy the very environment that attracts such tourism in the first place. Hence, there is a need to move towards a model of tourism that is compatible with these fragile landscapes.</p>		<p>It is not sufficient to talk of unplanned but to also talk of unregulated tourism</p>		<p>While undoubtedly ecosystems provide valuable services, the problem is with the marketised framework of forests</p>	<p>1.2 Most wilderness areas across India are fragile ecosystems that provide a whole host of ecosystem services to local residents and people living downstream; and continue to remain important tourist attractions. However, unplanned and unregulated tourism in such landscapes can destroy the very environment that attracts such tourism in the first place. Hence, there is a need to move towards a model of tourism that is compatible with these fragile landscapes.</p>

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<p>1.3 Ecotourism, when practiced correctly, is an important economic and educational activity. It has the scope to link to a wider constituency and build conservation support while raising awareness about the worth and fragility of such ecosystems in the public at large. It also promotes the non-consumptive use of wilderness areas, for the benefit of local communities living in and around, and dependent on these fragile landscapes.</p>		<p>This statement needs to reflect in the nature of tourism activities that will be allowed. The model do's and don'ts are not educative or transformative. They merely state what behaviours are allowed or not allowed. The benefit that is envisaged to accrue to the communities is also absent in the rest of the documentNot just communities around but also communities in the forests</p>		<p>A separate section be included on the activities that will be allowed and those which will not be allowed. Further, a broad framework to take into account conservation educationBy definition the term non-consumptive is when there is no extraction from the forest. However, trees are cut for building tourism establishments and we therefore need to review if tourism is in fact consumptive use</p>	<p>1.3 Ecotourism, when practiced correctly, is an important economic and educational activity. It has the scope to link to a wider constituency and build conservation support while raising awareness about the worth and fragility of such ecosystems in the public at large. It also promotes the non-consumptive use of wilderness areas, for the benefit of local communities living in and around, and dependent on these fragile landscapes.</p>
<p>1.4 In recent years, the mushrooming of tourist facilities around protected areas has led to the exploitation, disturbance and misuse of fragile ecosystems. It has also led to misuse of the term 'ecotourism', often to the detriment of the ecosystem, and towards further alienation of local people and communities.</p>	<p>This is an appropriate perspective</p>				

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<p>1.5 These directives and guidelines for ecotourism are applicable to any Protected Areas, whether rural or urban, including National Parks, Wildlife Sanctuaries, community reserves, conservation reserves, sacred groves, or pilgrimage spots located within protected areas and forested areas.</p>					
<p>1.6 Under Section 38 O 1 (c) of the Wildlife (Protection) Act, 1972, the National Tiger Conservation Authority may lay down normative standards for tourism activities and guidelines relating to tiger reserves.</p>					

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<p>1.7 Principles of Ecotourism Those who implement and participate in ecotourism activities should practice the following:</p> <ul style="list-style-type: none"> ● Adopt low-impact tourism that protects ecological integrity of wilderness areas, secures wildlife values of the destination and its surrounding areas ● Highlight the heritage value of India's wilderness and protected areas ● Build environmental and cultural awareness and respect ● Facilitate the sustainability of ecotourism enterprises and activities ● Provide livelihood opportunities to local communities ● Use indigenous, locally produced and ecologically sustainable materials for tourism activities 		<p>Since the definition of ecotourism takes into account the principles of ecotourism and the document is a guideline for implementation, the suggested text should be taken into consideration</p>			<p>Subsumed in ecotourism is the issue of sustainability. Based on the principles of the UNEP, for ecotourism to be sustainable, the following process would need to be followed: use the term in the FRA Ensures prior informed participation of all stakeholders Ensures equal, effective and active participation of all stakeholders Acknowledges adivasis' and other forest dwellers' right to say 'no' to tourism Development - to be fully informed, effective and active participants in the development of tourism activities within their communities, lands and territories Promote processes for adivasis and other forest dwellers' to control and maintain their resources, culture and rights.</p>

2. GUIDELINES FOR ECOTOURISM

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<p>It is important to involve all stakeholders in implementing ecotourism guidelines. Synergy and collaboration amongst the Central Government, State Governments, hospitality sector, State Forest Departments, Protected Area managements, and local communities and civil society institutions is vital for ensuring successful implementation of the guidelines.</p>				<p>Need to include Local Self Governance Institutions</p>	<p>It is important to involve all stakeholders in implementing ecotourism guidelines. Synergy and collaboration amongst the Central Government, State Governments, hospitality sector, State Forest Departments, Protected Area managements, and local communities, local self governance institutions and civil society institutions is vital for ensuring successful implementation of the guidelines.</p>

2.1. State Governments

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<p>2.1.1. The State Government must develop a State-level Ecotourism Strategy – a comprehensive plan to ensure, inter alia:</p> <ul style="list-style-type: none"> ● Wilderness conservation in ecologically sensitive landscapes ● Local community participation and benefit-sharing ● Sound environmental design and use of locally produced and sustainable materials ● Conservation education and training ● Adequate monitoring and evaluation of the impact of ecotourism activities ● Capacity building of local communities in planning, providing and managing ecotourism facilities 				<p>It is not sufficient to prepare a strategy. This process should be preceded by a policy, since strategies and plans are short term and focus on operational aspects, while policies are long term perspectives focussed on principles</p>	<p>2.1.1 The MoEF along with the MoT will prepare a draft ecotourism policy by December 31, 2011 and hold extensive civil society consultations during the policy formation process. The policy will be finalised and passed by June 1, 2012. The State level ecotourism strategy should be ready by December 31, 2012. The site specific ecotourism plans should be ready by June 2013. Civil society consultations should be a part of the formation of the strategies and the plans. There is a moratorium on further developments/construction/land transfer/change of policies (central and state levels) since vested interests and power lobbies operate to have actions in their favour. The integrity and intent of this process will be protected by the moratorium.</p>

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<p>2.1.2. The State-level Ecotourism Strategy must be in tune with the framework of guidelines provided here. Ecologically sensitive land use policies should be prescribed for the landscape surrounding protected areas. Adequate provisions must be made to ensure that ecotourism does not get relegated to purely high-end, exclusive tourism, leaving out local communities. Relevant modifications in State rules and regulations must be carried out in order to ensure adherence to these standards by tourist developers and operators. All States /union territories should notify the State level Ecotourism Strategy by December 31, 2011, and put the same in the public domain, in the local language also.-Refer suggestion for 2.1.1</p>			<p>"Ecologically sensitive land use policies should be prescribed for the landscape surrounding protected areas" - Need to be more specific about this. What is considered ecologically sensitive? For e.g. some writings on protected areas, see agriculture as ecologically detrimental land use. Will land policies be changed? What will be the implications on people living in these areas?</p>	<p>The MoEF along with the MoT will prepare a draft ecotourism policy by December 31, 2011 and hold extensive civil society consultations during the policy formation process. The policy will be finalised and passed by June 1, 2012. The State level ecotourism strategy should be ready by December 31, 2012. Civil society consultations should be a part of the formation of the strategies. Hard copies in local language be made available in the local Panchayat and district offices. The announcement of these be made in the local dailies</p>	<p>2.1.2. The State-level Ecotourism Strategy must be in tune with the framework of guidelines provided here. Ecologically sensitive land use policies should be prescribed for the landscape surrounding protected areas. It should also be ensured that no fencing and barriers are constructed by the resort owners. Adequate provisions must be made to ensure that ecotourism does not get relegated to purely high-end, exclusive tourism, leaving out local communities. Relevant modifications in State rules and regulations must be carried out in order to ensure adherence to these standards by tourist developers and operators. All States /union territories should notify the State level Ecotourism Strategy by December 31, 2012, and put the same in the public domain, in the local language also.-Refer suggestion for 2.1.1</p>
<p>2.1.3. No new tourist facilities are to be set up on forestlands. This is in compliance with the Wildlife (Protection) Act, 1972, and the directives of the Honourable Supreme Court.</p>			<ul style="list-style-type: none"> • What is a tourist facility? - lodge, interpretation centre, excursions, safaris, treks • Is this valid for commercial and non-commercial 	<p>It is critical to quote the actual case number, directives of the Supreme Court & section(s) of the WLPA and to unpack the questions raised</p>	

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			activities? • What happens to communities who live in forests and wish to be engaged themselves in ecotourism through CBT models		
<p>2.1.4. The State Government must develop a system by which gate receipts from Protected Areas should be collected by the Protected Area management, and not go as revenue to the State Exchequer. This will ensure that resources generated from tourism can be earmarked for protection, conservation and local livelihood development.</p>				<p>Sustainable energy needs of community to be met with these funds</p>	<p>50% of these receipts to be used for conservation and the remaining 50% for community development, based on proposals submitted to the Local Advisory and Monitoring Committee</p>
<p>2.1.5. The State Forest Department should be the arbiter in case of any dispute regarding the ecological advisability of any tourism plans, whether Protected Area Management, private entity, temple board or community, as the welfare of wildlife and Protected Areas/ biodiversity takes precedence over tourism.</p>		<p>The FD has clear vested interests and powerful and therefore, it cannot be a fair arbiter. An arbiter has to be neutral.</p>			<p>2.1.5. The National Green Tribunal and the Judicial system should be the arbiter in case of any dispute regarding the ecological advisability of any tourism plans, whether Protected Area Management, private/public entity, temple board or community, as the welfare of wildlife and Protected Areas/ biodiversity and the interests of the forest dwelling communities takes precedence over tourism.</p>

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<p>2.1.6. The Chief Wildlife Warden of the State must ensure that each Protected Area prepares an ecotourism plan, as part of the Management Plan/Annual Plan of Operation/ Tiger Conservation Plan. A site-specific Ecotourism Plan for each Protected Area must be prepared and approved by the State government by December 31, 2011, and put in the public domain; in the local language also. The Chief Wildlife Warden (CWLW) of the State shall develop a monitoring mechanism, estimate carrying capacity (model mechanism to calculate carrying capacity, provided in Annexure II), delineate tourism zones, and decide the area open to tourism on the basis of objective, scientific criteria.</p>				<p>The person responsible should not be CWLW but the PCCF. The person responsible should not be CWLW but the State level Steering Committee/Local Advisory and Monitoring Committee.</p> <p>Use the concept of limits of acceptable change. (a brief note on this concept is included as an annexure to these comments)</p>	<p>2.1.6. The PCCF of the State must ensure that each Protected Area prepares an ecotourism plan, as part of the Management Plan/Annual Plan of Operation/ Tiger Conservation Plan. A site-specific Ecotourism Plan for each Protected Area must be jointly prepared by the Forest Department and Department of Tourism and approved by the State government by June 1, 2013, and put in the public domain; in the local language also. The Local Advisory and Monitoring Committee shall develop a monitoring mechanism, estimate limits of acceptable change (model mechanism to calculate limits of acceptable change, provided in Annexure II), delineate tourism zones, and decide the area open to tourism on the basis of objective, scientific criteria.</p>

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<p>2.1.7. A State Level Steering Committee should be constituted under the chairmanship of the Chief Minister for quarterly review vis-à-vis the recommendations contained in the State-level Ecotourism Strategy. The Chief Wildlife Warden of the State shall be the Member Convener of the said committee. The State Government will decide its composition and rules of procedure. Each State should constitute State Level Steering Committees by December 31, 2011, and the names of its members should be put in the public domain. The Committee should have representation from local communities that live in and around Protected Areas, tribal welfare department, Panchayati Raj Institution and Civil Society Institutions.</p>				<p>Chairmanship – State Ministers of Forest and Tourism should share this responsibility. This is being suggested since the availability of the Chief Minister for such committees is difficult, it is feared that the committee will therefore be unable to function as envisaged.</p> <p>Member Convener - Secretaries of the Forest Department, Department of Tourism and Department of Tribal Affairs. The principle we wish to introduce is here is that people be taken into account in the conservation of forests and tourism. Therefore co-convenorship be introduced in order to bring in all perspectives</p>	<p>2.1.7. A State Level Steering Committee should be constituted under the co-chairmanship of the State Ministers of Forest and Tourism for quarterly review vis-à-vis the recommendations contained in the State-level Ecotourism Strategy. Secretaries of the Forest Department and Department of Tourism shall be co-member convenors of the said committee. The State Government will decide its composition and rules of procedure. Each State should constitute State Level Steering Committees by December 31, 2012, and the names of its members should be put in the public domain. The Committee should have representation from local communities that live in and around Protected Areas, representatives from committees formed under the FRA for protection of wildlife, forest and biodiversity, district level committee and the state level monitoring committee formed under the FRA, Department of Tourism, tribal welfare department, Panchayati Raj Institution and Civil Society Institutions.</p>

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<p>2.1.8. As part of the State-level Ecotourism Strategy, the State government should levy a "local conservation cess" as a percentage of turn-over², on all privately run tourist facilities within 5 km of the boundary of a Protected Area. The rate of cess should be determined by the State Government, and the monies thus collected should be earmarked to fund Protected Area management, conservation and local livelihood development, and not go to the State Exchequer as discussed in 2.1.4 above. Each State Government should notify the local conservation cess by December 31, 2011. The rationale for a local conservation cess should be clearly explained to the public at large, including through clear signage at local tourist facilities.</p>				<p>Protected Area Management should have representation from Local Self Governance Institutions.</p> <p>According to the Wildlife Conservation Strategy, 2002 "Lands falling within 10km. Of the boundaries of National parks and Sanctuaries should be notified as eco-fragile zones under section 3(v) of the Environment (protection) Act and Rule 5Sub-rule 5(viii)& (x) of the Environment (Protection) Rules.". Therefore, these guidelines should also adhere to the 10 kms rule. Use of cess should be put up in the public domain. FRA Committee Recommendation should be taken into account on issues of community benefit sharing: In all Protected Areas, local communities (especially those whose rights have been curtailed) must be given first claim of all eco-tourism franchises, a share in the revenues from park fees, and proactive support for building their capacities to run high-quality eco-tourism ventures. We recognise this is a complex</p>	<p>Use the following instead of privately-run tourist facilities:</p> <p>"all tourist facilities both private and public"</p> <p>facilities within <u>10 km</u> of the boundary of a Protected Area.(this should be modified in all instances where 5 kms from boundary appears)</p> <p>50% of the cess should be used for conservation and 50% for community development of people living in and around the forest areas. The cess will be decided depending on nature of establishment and turnover bracket – a slab basis.</p> <p>A cluster approach should be considered for the model of tourism infrastructure over a dispersed approach to mitigate negative impacts and ensure better regulation.</p>

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				<p>issue as it involves 2 aspects</p> <p>-</p> <ol style="list-style-type: none"> 1. Nature of tourism that is implemented by the local communities and 2. The issue of tourism zones, on which we comment later. With regard to the nature of tourism, what would be desirable would be community-based tourism (which implies community ownership) and this also needs regulatory guidelines. <p>50% of the cess should be used for conservation and 50% for community development of people living in and around the forest areas. The Tiger Task Force had recommended 30% of turnover. We recommend that the cess be decided depending on nature of establishment and turnover bracket - slab. This is to ensure that if the tourism establishments were to transfer the cess to the tourists, it would make access to ecotourism high-end and people from lower income brackets will be unable to visit these areas.</p>	

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				<p>These guidelines should be applicable to all tourism enterprises and not to only privately owned ones.</p> <p>Presence of tourism infrastructure in a clustered vs. dispersed model should be studied for their impacts. It seems prima facie that a clustered approach would have fewer negative impacts and can be better regulated.</p>	
<p>2.1.9. Financial assistance/ incentives should be provided for communities/individuals who own revenue lands outside protected areas, to convert such lands to forest status. The value of such lands for wildlife will be enhanced, even as it improves the income of the landowner from ecotourism.</p>		<p>This is a completely unsustainable idea - will the landowner convert the land into forestland and then run an ecotourism venture on it? Will it necessarily bring the same or higher revenues? Will the land owner know how to run such a venture - who will ensure its success?</p>	<p>Why would anyone want to convert their land to forest status? What is the incentive for people to convert?</p> <p>Furthermore, what is meant by conversion? Is it being suggested that there be a conversion of land to forestland? Is</p>	<p>This is not only, not the mandate of the committee, but due to the paucity of information the statement is very confusing. It is therefore suggested that this be struck off from the guidelines.</p>	<p>This section be removed</p>

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		<p>What happens to the Ministry's concern of carrying capacity of the region? An important criticism that is made is that at most National Parks the number of existing beds outnumbers the allowed number of visitors. Will this not worsen the situation? Also are communities expected to compete with high end establishments? This we feel is not within the mandate of the committee.</p>	<p>the government proposing to buy or acquire the land? Would it have the status of private forestland? What kind of activities would be allowed once the "conversion" happens? What is the assumption about continuing livelihood?</p>		
<p>2.1.10. A Local Advisory Committee (hereinafter referred to as LAC) must be constituted for each Protected Area by the State government. The LAC will have the following mandate:</p> <ul style="list-style-type: none"> • To review the State Ecotourism Strategy with respect to the Protected Area and make recommendations to the State government • To ensure site 			<p>One can prevent tourism coming in, but what about people who live in these areas?</p>	<p>Replace ecological tourism with ecotourism.</p> <p>According to the Wildlife Conservation Strategy, 2002 "Lands falling within 10km. Of the boundaries of National parks and Sanctuaries should be notified as eco-fragile zones under section 3(v) of the Environment (protection) Act and Rule 5Sub-rule 5(viii)& (x) of the Environment (Protection) Rules.".</p> <p>Therefore, these guidelines should also adhere to the 10</p>	<p>The following should also be the mandate of the LAMC:</p> <ul style="list-style-type: none"> • Regularly review impact of the tour operators of communities and address the same

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<p>specific restrictions on buildings and infrastructures in private areas in close proximity to core/critical tiger habitat/National Park/Sanctuary or buffer zone, keeping in mind the corridor value.</p> <ul style="list-style-type: none"> • To advise local and state government on issues relating to development of ecological-tourism in non-forest areas of ecological tourism zones etc. • Regularly monitor all tourist facilities falling within 5 km of a Protected Area vis-à-vis environmental clearance, area of coverage, ownership, type of construction, number of employees etc, for suggesting mitigation/retrofitting measures if needed. • Regularly monitor activities of tour 				<p>kms rule.</p> <p>This committee should be named 'Local Advisory and Monitoring Committee (LAMC)' and the PA Management is accountable to this committee on issues related to these guidelines. The LAMC should be accountable in turn to the SLMC. Details on governance structure are outlined in the note attached.</p>	

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<p>operators to ensure that they do not cause disturbance to animals while taking visitors into the Protected Area.</p>					
<p>2.1.11. Composition of LAC:</p> <ul style="list-style-type: none"> • District Collector (Chairman) • PA Manager (Member Secretary) • Local Territorial DFO • Honorary Wildlife Warden (if present) • Official of State Tourism Department • Block Development Officer (1) • Members of Local Panchayats (2) • Wildlife scientist (1) • Local conservationists (2) • Representative from Civil Society Institution (1) • In case of North Eastern States, the traditional village councils should be recognized as equivalent to Panchayat Members, wherever such councils exist. • For Tiger Reserves, 				<p>Remove the following: For Tiger Reserves, the Tiger Conservation Foundation should be the overseeing authority and should include members that are not represented in the Tiger Conservation Foundation.</p>	<p>Include the following: Social Scientist (1) Representatives from committees formed under the FRA for protection of wildlife, forest and biodiversity (1) A federated structure be used to select/elect the Panchayat representative or 1 member from each of the panchayats in and around the PA. Where applicable a member of the Tiger Conservation Foundation should be part of the LAMC</p>

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<p>the Tiger Conservation Foundation should be the overseeing authority and should include members that are not represented in the Tiger Conservation Foundation.</p> <ul style="list-style-type: none"> The Detailed Terms of Reference of individual Local Advisory Committee will be determined at the State level. 					

2.2. Protected Area Management

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<p>2.2.1. Each Protected Area must develop its own Ecotourism Plan, as part of its Tiger Conservation Plan, Management Plan, or Annual Plan of Operation, and should be duly approved by the Chief Wildlife Warden of the State and the National Tiger Conservation Authority (where relevant). The plan should be consistent with the State Ecotourism Strategy and must be</p>			<p>v) Community-Based Tourism Strategy - The statement is vague. There is no clarity on how and who will ensure the successful implementation of this.</p>	<p>The plan and reports should be in public domain</p> <p>i) According to the Wildlife Conservation Strategy, 2002 "Lands falling within 10km. Of the boundaries of National parks and Sanctuaries should be notified as eco-fragile zones under section 3(v) of the Environment (protection) Act and Rule 5Sub-rule 5(viii)& (x) of the Environment (Protection) Rules."</p>	<p>i) Based on the Wildlife Conservation Strategy, 2002, identify (using GIS) and monitor the ecologically sensitive areas surrounding PAs, in order to ensure the ecological integrity of corridor/buffer areas, and prevent corridor pinching/destruction. Furthermore, parameters of monitoring as outlined in these guidelines should be followed.</p> <p>ii) Assess limits of acceptable change of the Protected Area, at three levels: physical, real and effective/permisible limits of</p>

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<p>approved by the LAC and the State Government. An ecotourism plan for each PA must be notified by December 31, 2011, and put in the public domain, in the local language also. The plan should:</p> <p>i) Identify (using GIS) and monitor the ecologically sensitive areas surrounding PAs, in order to ensure the ecological integrity of corridor/buffer areas, and prevent corridor pinching/destruction</p> <p>ii) Assess carrying capacity of the Protected Area, at three levels: physical, real and effective/permisible carrying capacity of visitors and vehicles (See Annexure II)</p> <p>iii) Set a ceiling level on number of visitors allowed to enter a Protected Area at any given time, based on the carrying capacity of the habitat.</p> <p>iv) Indicate the area open to tourism in the reserves to be designated as 'ecotourism zone'.</p> <p>v) Develop a participatory community-based tourism strategy, in collaboration</p>				<p>Therefore, this guidelines should also adhere to the 10 kms rule</p> <p>Apart from GIS which would only monitor violations in terms of geographical location (latitude and longitude), the guidelines should also specify parameters for evolving a monitoring plan such as Tourism Impact Assessment (brief note attached).</p> <p>ii) Use the concept of limits of acceptable change. (a brief note on this concept is included as an annexure to these comments)</p> <p>v) There needs to be a clear mechanism outlined to ensure the modalities of setting up the community-based tourism initiatives.</p> <p>vi) The use of the term privately operated may mislead into the notion of privileging low volume high value or high-end tourism which is in contradiction to 2.1.2 which mentions that ecotourism should not be relegated to high-end tourism. These guidelines</p>	<p>acceptable change of visitors and vehicles</p> <p>iii) Set a ceiling level on number of visitors allowed to enter a Protected Area at any given time, based on the limits of acceptable change of the habitat.</p> <p>vi) List of tourism activities allowed.</p> <p>vii) Develop monitoring mechanisms to assess impact of tourism activities on communities, environment, wildlife and tourists</p> <p>vi) Develop codes and standards for all tourist facilities located in the vicinity of core/critical wildlife habitats, eco-sensitive zones or buffer areas, with a view to, inter alia, ensure benefit and income to local communities.</p>

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<p>with local communities, to ensure long-term local-community benefit-sharing, and promotion of activities run by local communities</p> <p>vi) Develop codes and standards for privately operated tourist facilities located in the vicinity of core/critical wildlife habitats, eco-sensitive zones or buffer areas, with a view to, inter alia, ensure benefit and income to local communities.</p> <p>vii) Develop monitoring mechanisms to assess impact of tourism activities</p> <p>viii) Develop generic guidelines for environmentally acceptable and culturally appropriate practices, and for all new constructions</p> <p>ix) Do's and Don'ts for visitors (see Annexure I)</p>				<p>should be applicable to the range of tourism enterprises - private (companies, community owned) as well as state owned, as well as the range in terms of size.</p>	
<p>2.2.2. In the case of human animal conflicts, compensation should be paid within a period of 15 days apart from immediate payment of ex gratia. In case of North Eastern States, the traditional village councils should be recognized and made responsible for this</p>			<p>A. Human-animal conflict is attributed to tourism? B. Persons receiving compensation are local people, tourists or both? Where is the compensation paid from?</p>	<p>This statement in the guidelines is absolutely arbitrary and has no bearings with tourism. This statement should be struck off the guidelines</p>	<p>This statement should be struck off the guidelines</p>

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
purpose, wherever such councils exist.					
2.2.3. All ecotourism activities should take place only in delineated 'ecotourism zones' delineated in the ecotourism plan.				<p>List out ecotourism activities which will be allowed in which part of the PAs and which will not be allowed.</p> <p>Just as in the case of rotation grazing, rotation tourism could be considered as an option to allow the regeneration of fragile natural areas. However, this decision would need to be taken after looking into the pros and cons of both rotational tourism and fixed tourism zones.</p>	
2.2.4. Given that traditional tourism has been happening in national parks/sanctuaries; many of which now form part of core/critical tiger habitat or critical wildlife habitat, and also taking note of the need to implement the provisions of the Wildlife (Protection) Act, 1972, the following norms maybe be adhered to			<p>What is the long-term view/perspective of restoring a portion of the buffer into wildlife habitat? On what basis has the percentage of restoration been arrived at? Once the lands are restored to wildlife</p>	<p>The condition on buffer areas being restored to wildlife habitat should be excluded as there is varying habitation and land use. Given this, there is no surety that the percentage of the surrounding land can be 'reclaimed' as forest. Furthermore, we reiterate the point made in 2.1.9, that it is not for the committee to</p>	<p>a) Larger than 500 sq.km, 20% of such areas may be permitted for regulated ecotourism access b) Smaller than 500 sq.km, 15% of such areas may be permitted for regulated ecotourism access</p>

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<p>in the context of ecological-tourism activities, and included in the ecotourism plan of the Protected Area. For critical wildlife habitats of national parks/sanctuaries and for core/critical tiger habitats of tiger reserves;</p> <p>a) Larger than 500 sq.km, 20% of such areas may be permitted for regulated ecotourism access, subject to the condition that 30% of the surrounding buffer/fringe area should be restored as a wildlife habitat in 5 years.</p> <p>b) Smaller than 500 sq.km, 15% of such areas may be permitted for regulated ecotourism access, subject to the condition that 20% of the surrounding buffer/fringe area should be restored as a wildlife habitat in 5 years.</p>			<p>habitat what is the plan for these lands? These guidelines are attempting to set goals for “conservation” through ecotourism. However it must be noted that there is little clarity on the impact of such goals , and therefore this section becomes unclear in its intent and implementation.</p>	<p>suggest change in land use patterns.</p>	
<p>2.2.5. Any core area in a Tiger Reserve from which relocation has been carried out, will not be used for tourism activities. Forest dwellers who have been relocated will be given priority in terms of livelihood generation activities related to</p>	<p>In accordance with FRA provisions</p>	<p>It should not be restricted to tiger reserves alone but to all forest areas where displacement has taken place</p>	<p>How will the state ensure that this will happen with the presence of private sector which would have their own standards for who is fit to work for them and who is not? Furthermore,</p>	<p>It should be guaranteed that all relocation is voluntary and it will be the responsibility of the bodies formed under these guidelines to ensure that no coercion, direct or indirect, is used.</p> <p>Livelihood should be tied</p>	<p>2.2.5. Any core area in a Tiger Reserve/Protected Area/Wildlife Sanctuary, community and conservation reserves, from which voluntary relocation has been carried out, will not be used for tourism activities. Forest dwellers who have been voluntary relocated will be given priority in terms of livelihood generation activities related to</p>

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<p>ecotourism in the Protected Area from which they have been relocated. Protected Area Management will make a special effort in this regard.</p>			<p>it will be difficult for local people to compete with established operators. Finally, forest dwellers might not be interested in livelihoods from tourism</p>	<p>with capacity building so as to ensure that communities are not relegated to menial tasks, without affecting adversely their sense of dignity and control over their lives. This will make people employable and not dependent on companies' goodwill for employment.</p>	<p>ecotourism in the Protected Area from which they have been relocated. In recognition of the fact that communities are not on a level playing field with the city educated professionals, Protected Area Management will make a special effort in this regard through the enhancing of capacities of communities to be able to participate in ecotourism enterprises, if they so desire.</p>
<p>2.2.6. Tourism infrastructure must conform to environment-friendly, low-impact architecture, including solar energy, waste recycling,, rainwater harvesting, natural cross-ventilation, reduced used of asbestos, controlled sewage disposal, and merging with the surrounding habitat</p>			<p>2.3.1 mentions no use of asbestos while this statement mentions 'reduced use of asbestos'. This is a contradiction. No asbestos should prevail.</p>	<p>No asbestos No swimming pools Water situation to be taken into consideration. No fencing and barriers Use of light in external spaces should be limited as these can be harmful to small insects. Even if they are used, they should be muted. There should be a time fixed when all lights on the outside will be switched off. Building of artificial structures like swimming pools and bath tubs go against nature which is what this kind of tourism aims at. Therefore, significant discouraging and regulation and the kind and number of pools even where water is not a problem should be considered.</p>	<p>2.2.6. Tourism infrastructure must conform to environment-friendly, low-impact architecture, including solar energy and other sustainable energy sources, waste and water recycling, waste composting, rainwater harvesting, natural cross-ventilation and lighting, no air-conditioning and heating, discourage swimming pools, appropriate sewage treatment and merging with the surrounding habitat, minimal interference with natural landscape and no exotic/alien species,</p> <p>All architectural designs and material use would need to be approved by the LAMC.</p> <p>Surrounding habitat and the design and architecture should be in keeping with local cultural traditions using locally sourced material</p>

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
				<p>No lawns or growing exotic varieties or trees which draw a lot of water</p> <p>No use of chemical-based fertilizers and pesticides</p>	
<p>2.2.7. In a phased manner (within five years), permanent residential facilities located inside of core-critical tiger habitat/critical wildlife habitat, which are being used for wildlife tourism should be moved to revenue lands outside.</p>			<p>What about National Parks and Wildlife Sanctuaries</p>	<p>Operations should be shut down</p>	<p>2.2.7. In a phased manner (within five years), operations of permanent residential facilities located inside of core-critical tiger habitat/critical wildlife habitat, which are being used for wildlife tourism should be shut down. The LAMC will monitor this.</p>
<p>2.2.8. Protected Area authorities must ensure that all facilities within a 5 km radius of core/critical wildlife habitats/PAs/reserves must adhere to all environmental clearances, noise pollution norms, and are non-polluting, blending in with surroundings. Severe penalties must be imposed for non-compliance.</p>				<p>According to the Wildlife Conservation Strategy, 2002 "Lands falling within 10km. Of the boundaries of National parks and Sanctuaries should be notified as eco-fragile zones under section 3(v) of the Environment (protection) Act and Rule 5Sub-rule 5(viii)& (x) of the Environment (Protection) Rules." Therefore, this guidelines should also adhere to the 10 kms rule</p>	<p>2.2.8. Protected Area authorities must ensure that all facilities within a 10 km radius of core/critical wildlife habitats/PAs/reserves must adhere to all environmental clearances, noise pollution norms, and are non-polluting, blending in with surroundings. Severe penalties must be imposed for non-compliance.</p>

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
2.2.9. There shall be a complete ban on burying, burning or otherwise disposing non-biodegradable or toxic waste in the tourism area.				System of collecting non-biodegradable toxic waste should be put in place. Safe disposal outside the core, buffer/eco-sensitive zone. Cess (from the share for conservation) may be considered to be used. Toxic waster should not be allowed to enter into the tourism zone.	
2.2.10. In the case of number of visitors/vehicles exceeding carrying capacity, establish an advance booking system to control tourist and vehicle numbers. Rules of booking must be transparent, and vehicles must strictly maintain a distance of 15 m from one another when stationary. Violators must be penalized, since congestion and overcrowding in this manner causes undue disturbance to wild animals that are being observed.				It must be noted, that the Tiger Task Force suggests a distance of 500 m, which is also the current rule. These guidelines should adhere to this instead of the 15 m suggested. Use the concept of limits of acceptable change. (a brief note on this concept is included as an annexure to these comments)	2.2.10. In the case of number of visitors/vehicles exceeding limits of acceptable change, establish an advance booking system to control tourist and vehicle numbers. Rules of booking must be transparent, and vehicles must strictly maintain a distance of 500 m from one another when stationary. Violators must be penalized, since congestion and overcrowding in this manner causes undue disturbance to wild animals that are being observed.
2.2.11. Protected Area authorities must delineate a minimum area for the visitor facility, which should be in a site-specific manner.				Kanha is a good example of the visitor and interpretation facility but it should not be inside the Park	2.2.11. Protected Area authorities must delineate a minimum area for the visitor facility, which should be located outside the park between 500 m – 1 km from the gate of the park. The choice should be conducted in a site-specific manner.

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
					The visitor facility would be used as the entry point for visitors in the park, where before entering the park, a minimum 1/2 hour educative session will be conducted-well-designed, creative, interactive, educative and transformative experience.
2.2.12. Residential tourist facilities (number of beds) should be in conformity with the carrying capacity of the PA.				<p>According to the Wildlife Conservation Strategy, 2002 "Lands falling within 10km. Of the boundaries of National parks and Sanctuaries should be notified as eco-fragile zones under section 3(v) of the Environment (protection) Act and Rule 5Sub-rule 5(viii)& (x) of the Environment (Protection) Rules.".</p> <p>Therefore, this guidelines should also adhere to the 10 kms rule</p> <p>Use the concept of limits of acceptable change. (a brief note on this concept is included as an annexure to these comments)</p>	2.2.12. Residential tourist facilities (number of beds) should be in conformity with the limits of acceptable change of the PA.Stop further construction if already exceeding capacity. Residential facilities should range across all budgets and should be accessible to people from all strata of society

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
2.2.13. In the case of Tiger Reserves, ecotourism should be under the oversight of the respective Tiger Conservation Foundations for each tiger reserve, to enable Eco Development Committees/ Village Forest Committees/ forest cooperatives to strengthen the institutional framework through a Memorandum of Understanding.		The EDCs were formed in the context of the WB funded eco development project. With the conclusion of this project these committees no more have a legitimacy for existing. Further, with the presence of the Panchayat, there is no need for any other structure			Ecotourism in all forest areas should be under the oversight of the LAMC. Where applicable a member of the Tiger Conservation Foundation should be part of the LAMC.

2.3. Tourist facilities/ Tour operators

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
2.3.1. Tourism infrastructure must conform to environment-friendly, low-impact architecture; renewables including solar energy, waste recycling, rainwater harvesting, natural cross-ventilation, no use of asbestos, controlled sewage disposal, and merging with the surrounding landscape.				<ul style="list-style-type: none"> • Yes. • No asbestos • No swimming pools • Water situation to be taken into consideration. • Building of artificial structures like swimming pools and bath tubs go against nature which is what is kind of tourism aims at. Therefore significant discouraging and regulation and the kind and number of pools even where 	Add the following text: Any infrastructure developed, should not: cause the depletion of natural resources like water restrict the communities' access to natural resources

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
				<p>water is not a problem should be considered</p> <ul style="list-style-type: none"> • No lawns or growing exotic varieties or trees which draw a lot of water • No use of chemical-based fertilizers and pesticides 	
<p>2.3.2. All tourist facilities falling within 5 km of a protected area must be reviewed regularly by the Local Advisory Committee vis-à-vis environmental clearance, area of coverage, ownership, type of construction, number of employees, etc, for suggesting mitigation/retrofitting measures if needed.</p>				<p>Tourism facilities should be registered under the Tourism Trade Act (many state Acts need to be revised taking into account more recent trends and requirements).</p> <p>According to the Wildlife Conservation Strategy, 2002 "Lands falling within 10km. Of the boundaries of National parks and Sanctuaries should be notified as eco-fragile zones under section 3(v) of the Environment (protection) Act and Rule 5Sub-rule 5(viii)& (x) of the Environment (Protection) Rules.".</p> <p>Therefore, these guidelines should also adhere to the 10 kms rule.</p> <p>Format for monitoring of these should be elaborated in the Ecotourism Plan</p>	<p>Add the following text:2.3.2. All tourist facilities falling within 10 km of a protected area must be reviewed regularly by the Local Advisory Monitoring Committee vis-à-vis environmental clearance, area of coverage, ownership, type of construction, number of employees - disaggregated on several indicators waste, water, construction materials, backward linkages etc based on sustainable/responsible tourism for suggesting mitigation/retrofitting measures if needed.The LAMC will also monitor impacts of tourism on communities and environment</p>

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
<p>2.3.3. All tourism facilities located within five kms. of a Protected Area must adhere to noise pollution rules under 'The Noise Pollution (Regulation and Control) Rules', 2000, and 'The Noise Pollution (Regulation and Control) (Amendment) Rules', 2010 issued by the Ministry of Environment and Forests.</p>				<p>According to the Wildlife Conservation Strategy, 2002 "Lands falling within 10km. Of the boundaries of National parks and Sanctuaries should be notified as eco-fragile zones under section 3(v) of the Environment (protection) Act and Rule 5Sub-rule 5(viii)& (x) of the Environment (Protection) Rules.". Therefore, this guidelines should also adhere to the 10 kms rule</p>	<p>2.3.3. All tourism facilities located within ten kms. of a Protected Area must adhere to noise pollution rules under 'The Noise Pollution (Regulation and Control) Rules', 2000, and 'The Noise Pollution (Regulation and Control) (Amendment) Rules', 2010 issued by the Ministry of Environment and Forests.</p> <p>To meet the requirements of the noise pollution rules, water and other requirement of local pollution control bodies, EIAs should be conducted</p>
<p>2.3.4. All tourist facilities, old and new must aim to generate at least 50% of their total energy and fuel requirements from alternate energy sources that may include wind, solar and biogas.</p>	<p>Shift to alternates is good, however</p> <ol style="list-style-type: none"> 1. Actual generation should be done at the site and, 2. It must be studied if the impact of the sourcing of this material will impact communities' supply and access of these resources 			<p>If the shift is viable for tourist facilities, they should also provide knowledge, technical and maintenance support to communities as a CSR initiative</p>	<p>If the shift is viable for tourist facilities, they should also provide knowledge, technical and maintenance support to communities as a CSR initiative. If the resort has the means to generate more energy through alternative sources, it should supply this at a nominal cost to the local communities, who currently have to pay high amounts for their daily consumption needs. This should also be seen as a CSR initiative</p>
<p>2.3.5. There shall be a complete ban on burning or disposing non-biodegradable waste within the Protected Area or in surrounding eco-sensitive zone or buffer area.</p>			<p>What is the waste disposal mechanism that should be adopted?</p> <p>Part of the funding for this could be from the cess</p>		

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
			earmarked for conservation		
2.3.6. The use of wood as fuel shall be prohibited, except for campfires for which wood must be procured from State Forest Department/Forest Development Corporation depots.					
2.3.7. In order to allow free passage to wildlife, development should be sensitive to the conservation of flora and fauna, and the corridor value of the area.					2.3.7. In order to allow free passage to wildlife, development should be sensitive to the conservation of flora and fauna, and the corridor value of the area and therefore no fencing will be allowed.
2.3.8. Tourist facilities/tour operators must not cause disturbance to animals while taking visitors on nature trails.					2.3.8. Tourist facilities/tour operators must not cause disturbance to animals and invade peace and privacy of communities' while taking visitors on nature trails.

2.4. Temple/Pilgrimage Boards/ Community nurtured sacred groves

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
<p>2.4.1. Pilgrim sites located inside Protected Areas must be designated as sacred groves, with strict building and expansion controls, in accordance with the Forest Conservation Act, 1980 and the Environment Protection Act, 1986.</p>		<p>We would like a clear differentiation between sacred groves and other pilgrim sites in these guidelines</p>		<p>Sacred groves are forest patches conserved by the local people intertwined with their socio-cultural and religious practice. Pilgrim sites are sites of worship and are not necessarily intrinsic to the socio-cultural and religious context of the people in the vicinity of the pilgrim sites. It is critical that these guidelines recognise the difference between pilgrim sites and sacred groves. It must be recognised that the sacred groves would have a different system and method of community 'governance'. As sacred groves are very private intimate and sacred spaces for communities, they cannot be considered tourism sites.</p> <p>As for pilgrim sites, as large no of sites are located in protected areas, a massive programme to educate pilgrims on the kind of ecological fragile spaces they are entering and the need for them to modify their negative behaviour. Also planning of basic amenities</p>	<p>2.4.1. Pilgrim sites located inside Protected Areas should be governed by strict building and expansion controls, in accordance with the Forest Conservation Act, 1980 and the Environment Protection Act, 1986.</p> <p>A programme to educate pilgrims on the kind of ecological fragile spaces they are entering and the need for them to modify their negative behaviour should be offered to Temple Trusts and visiting pilgrims.</p> <p>Planning of basic amenities and facilities to minimise waste, environmental damage and mapping of routes appropriately.</p> <p>Sacred groves are very private intimate and sacred spaces for communities, and follow a different system and method of community governance; they cannot be considered tourism sites.</p>

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
				and facilities to minimise waste, environmental damage and mapping of routes appropriately. Mass tourism - recognise this as a critical area requiring much more thought during planning	
2.4.2. All transit camps and places of stay for such pilgrimage must be restricted to nominated days in a year				Consult with local communities as they may not be adequately represented in Temple Trusts.	2.4.2. All transit camps and places of stay for such pilgrimage must be restricted to nominated days in a year in consultation with local communities.
2.4.3. All rules that apply to tourism facilities including noise, building design, use of alternate energy and free passage to wildlife will apply to such pilgrim facilities.					
2.4.4. Temple boards must negotiate terms of revenue sharing with local communities, and channel a minimum of five percent of gross revenue collected into development of local communities through the Panchayat and Gram Sabha.				We suggest that the percentage be revised upwards given the negative impacts of mass pilgrimage tourism on local spaces and communities	2.4.4. Temple boards must negotiate terms of revenue sharing with local communities, and channel a minimum of five percent of gross revenue collected into development of local communities through the Panchayat and Gram Sabha. The LAMC will monitor this. Information and accountability should be in the public domain-how much and what it is spent on

2.5. Local Communities

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
2.5.1. The first benefit from ecotourism must go to the local people, and in the long-run, capacity-building should be carried out to forge a sustainable partnership between the forest department, tourism professionals and local communities				We need to talk about ownership and not just benefits	2.5.1. The first benefit from ecotourism must go to the local people, and in the long run, capacity building should be carried out to forge a sustainable partnership between the forest department, tourism department, tourism professionals and local communities. The long-term goal is for communities to be able to own the ecotourism enterprises through among other methods, active participation in their governance.
2.5.2. Soft loans may be provided for Community Credit Programme/Special Trust Funds/ Special Central Assistance/ Developmental Schemes of Tribal Department/District level Integrated Developmental Programme/ Tiger Conservation Foundation, to pre-identified local-community/beneficiaries for promoting ecotourism.		We assume the guidelines mean from and not for			2.5.2. Soft loans may be provided from Community Credit Programme/Special Trust Funds/ Special Central Assistance/ Developmental Schemes of Tribal Department/District level Integrated Developmental Programme/ Tiger Conservation Foundation, to pre-identified local-community/beneficiaries for promoting ecotourism. Preference must be given not to individual but collective forms of tourism ventures so that benefits can be accrued to larger groups, dynamics of power, caste, class, religion and gender in the accessing of these resources

2.6. Public / Visitors

Draft guidelines	Positive	Negative	Unclear	Suggestions	Suggested Revised Text
<p>2.6.1. Public / Visitors must abide by the code of conduct, and 'Do's and Don'ts, as developed by the Protected Area Management. Model "Do's and Don'ts" are detailed in Annexure I.</p>				<p>This statement needs to reflect in the nature of tourism activities that will be allowed. The model do's and don'ts are not educative or transformative. They merely state what behaviours are allowed or not allowed. Should evolve from the Ecotourism Plan, which would in turn be based on a wide range of consultations. Should not prescribe only about behaviour, but should inculcate a deeper respect for nature, people and their cultures</p>	